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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEBT RESOLVE, INC.

Plaintiff,

v.

APOLLO ENTERPRISE SOLUTIONS,
INC.

Defendant.

DEFENDANT'S NOTICE OF
MOTION AND MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION
AND IMPROPER VENUE

[F.R.C.P. 12(b)(2) and 12(b)(3)]

Civil Action No. 07-103

**DEFENDANT APOLLO ENTERPRISE SOLUTIONS, INC.'S
MOTION TO DISMISS**


Please take notice that on March 19, 2007, Defendant Apollo Enterprise Solutions, Inc. will move this Court, pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3), for an Order dismissing this action against it on the grounds that this Court lacks personal jurisdiction over Apollo and the District of New Jersey is an improper venue for this action.

In support of this motion, Defendant will rely upon: the accompanying Memorandum of Law and the accompanying Affidavits of Christopher Imrey and Jenniefer A. Trusso, upon the papers, records and pleadings on file herein.

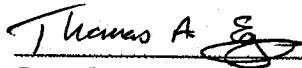
Respectfully submitted,

Dated: February 13, 2007

STRADLING YOCCA CARLSON & RAUTH
Attorneys for Defendant
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